## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

LEILA GREEN LITTLE, JEANNE	§	Civil Action No. 1:22-cv-00424-RP
PURYEAR, KATHY KENNEDY,	§	
REBECCA JONES, RICHARD DAY,	§	
CYNTHIA WARING, AND DIANE	§	
MOSTER,	§	
	§	
Plaintiffs,	§	
	§ §	
v.	§	
	§	
LLANO COUNTY, RON CUNNINGHAM,	§	
in his official capacity as Llano County	§	
Judge, JERRY DON MOSS, in his official	§	
capacity as Llano County Commissioner,	§	
PETER JONES, in his official capacity as	§	
Llano County Commissioner, MIKE	§	
SANDOVAL, in his official capacity as	§	
Llano County Commissioner, LINDA	§	
RASCHKE, in her official capacity as Llano	§	
County Commissioner, AMBER MILUM,	§	
in her official capacity as Llano County	§	
Library System Director, BONNIE	§	
WALLACE, in her official capacity as	§	
Llano County Library Board Member,	§	
ROCHELLE WELLS, in her official	§	
capacity as Llano County Library Board	§	
Member, RHONDA SCHNEIDER, in her	§	
official capacity as Llano County Library	§	
Board Member, and GAY BASKIN, in her	§	
official capacity as Llano County Library	§	
Board Member,	§	
	§	
Defendants.	§	

DECLARATION OF RICHARD DAY IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

## I, Richard Day, declare:

- I make this declaration based on personal knowledge. If called upon to testify, I could and would testify competently to the following facts.
- 2. I am a resident of Llano County. I have a library card that gives me access to books available in the County's public libraries, which I have used to check out books on various topics, and nonfiction books in particular.
- 3. In addition to reading for personal enjoyment and enrichment, I also have professional experience in libraries. Before attending medical school, I received a master's degree in Library and Information Science from the University of Texas at Austin. I previously worked as a rare book cataloger at the Moody Medical Library at the University of Texas Medical Branch in Galveston. I also worked at the University of Texas Health Sciences Center at San Antonio as the head of cataloging, a reference librarian, and as medical liaison librarian to the pediatrics department. While I was in active practice as a physician, I also served for many years on the library board in Wichita Falls, Texas.
- 4. I know that several books were removed from Llano County's physical library collection, including at least the following books: (1) Caste: The Origins of Our Discontent by Isabel Wilkerson; (2) They Called Themselves the K.K.K: The Birth of an American Terrorist Group by Susan Campbell Bartoletti; (3) Spinning by Tillie Walden; (4) In the Night Kitchen by Maurice Sendak; (5) It's Perfectly Normal: Changing Bodies, Growing Up, Sex and Sexual Health by Robie Harris; (6) a read-aloud picture book series including My Butt is So Noisy!, I Broke My Butt!, and I Need a New Butt! by Dawn McMillan; (7) a read-aloud picture book series including Larry the Farting Leprechaun, Gary the Goose and His Gas on the Loose, Freddie the Farting Snowman, and Harvey the Heart Has Too Many Farts by Jane Bexley; (8) Being Jazz:

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My Life as a (Transgender) Teen by Jazz Jennings; (9) Shine by Lauren Myracle; (10) Gabi, a

Girl in Pieces by Isabel Quintero; and (11) Freakboy by Kristin Elizabeth Clark. I cannot check

out these books because they are no longer on library shelves or in the Llano County library

catalog. I would check out these books from the Library System in the future if they were

returned to library shelves.

5. I have also attempted to access OverDrive with my County library card without

success. I would use my County library card to access ebooks and audiobooks on OverDrive in

the future if access to OverDrive were reinstated.

I swear under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct to the best of my knowledge.

Dated: May 8, 2022

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Richard Day